BEFORE THE DEPARTMENT OF TRANSPORTATION WASHINGTON, D.C.

Application of

Singapore Airlines Cargo PTE Limited

for a Statement of Authorization pursuant to 14 C.F.R. Part 212

Docket DOT-OST-2008-____

APPLICATION OF SINGAPORE AIRLINES CARGO PTE LIMITED FOR A STATEMENT OF AUTHORIZATION

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Attorneys for

SINGAPORE AIRLINES CARGO PTE LIMITED

Dated: January 2, 2008

NOTICE: ANY PERSON MAY FILE AN ANSWER TO THIS APPLICATION.

ANSWERS MUST BE FILED IN THIS DOCKET, AND SERVED UPON THE PERSONS LISTED ABOVE, ON OR BEFORE JANUARY 14, 2008. HOWEVER, APPLICANT IS SEEKING EXPEDITED RELIEF AND WILL

POLL ALL INTERESTED PARTIES.

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Pursuant to 14 C.F.R. Part 212, Singapore Airlines Cargo PTE Limited ("SQC") hereby applies for a Statement of Authorization, which would enable SQC to display the "JL" airline designator code of Japan Airlines International Co. Ltd. on all-cargo flights operated by SQC on its Singapore-Osaka (Kansai International Airport)-Los Angeles route. SQC and Japan Airlines have concluded an agreement that calls for JL to codeshare on this routing and to block space on the SQC flight. The carriers intend to commence sales for this service as soon as they receive all the necessary approvals. Accordingly, SQC is seeking expedited approval of this Application and will poll all interested parties.

In support of this Application, SQC states as follows:

1. SQC requests authority to display the "JL" airline designator code on flights operated by SQC on its Singapore-Osaka (Kansai International Airport)-Los Angeles route. As demonstrated below, SQC and JL currently hold the necessary traffic rights to perform this service.

- 2. SQC holds a foreign air carrier permit, which authorizes it to operate all-cargo service. See Order 2001-9-14. Under the terms of that permit, SQC may operate all-cargo services:
- a. From points behind Singapore via Singapore and intermediate points to a point or points in the United States and beyond; and
 - b. Between the United States and any point or points.
- 3. Japan Airlines also holds a Foreign Air Carrier Permit. See Order 98-4-17. Under the terms of its permit, JL may operate between any point or points behind Japan, via any point or points in Japan, and any intermediate point or points, and any point or points in the United States, and any point or points beyond.
- 4. Singapore and the United States are both signatories to the Multilateral Agreement on the Liberalization of Air Transport Services ("MALIAT") and to a bilateral Open Skies agreement. Both agreements expressly authorize the code-share services covered by this Application. *See, e.g.,* MALIAT, Article 8.2.C. Similarly, the U.S.-Japan agreement also authorizes the code-share services described herein. *See* Part 4 of the 1998 U.S.-Japan Memorandum of Understanding. No bilateral restrictions, therefore, would prevent the operation of the proposed code-share service.
- 5. SQC requests that the Department approve this Application for an indefinite period, as long as the carriers' code-share agreement remains in effect. The carriers will notify the Department if the agreement is terminated.
- 6. SQC also requests route integration authority to permit it to combine this exemption authority with its other exemption authority, to the extent permitted by applicable international agreements.

SINGAPORE AIRLINES CARGO PTE LIMITED APPLICATION FOR STATEMENT OF AUTHORIZATION

- 7. Grant of this Application is in the public interest. The Department has stated in its International Aviation Policy that "code-sharing and other cooperative marketing arrangements can provide cost-effective ways for carriers to enter new markets, expand their systems, and obtain additional flow traffic to support their operations by using existing facilities and scheduled operations." See U.S. International Air Transportation Policy Statement (April 1995), at 4. The proposed arrangement will meet all of these criteria. The code-share/block-space arrangement between SQC and JL will provide improved cargo service between the United States and Japan and in other markets.
- 8. SQC and JL will abide by Department's regulations concerning codeshare operations.
- 9. SQC requests a waiver of the provision that requires that carriers file requests for statements of authorization at least 45 days in advance of their proposed startup date.

WHEREFORE, for the foregoing reasons, Singapore Airlines Cargo PTE Limited respectfully requests that the Department approve this application for a Statement of Authorization. Singapore Airlines Cargo PTE Limited further requests any different or additional relief that the Department may deem necessary.

SINGAPORE AIRLINES CARGO PTE LIMITED APPLICATION FOR STATEMENT OF AUTHORIZATION

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing on the persons identified below by causing a copy to be sent by electronic mail.

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Sophy Chen, Esq. January 2, 2008

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